

1 JACK P. DICANIO (SBN 138782)
Jack.DiCanio@skadden.com
2 EMILY A. REITMEIER (SBN 305512)
Emily.Reitmeier@skadden.com
3 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
525 University Avenue
4 Palo Alto, California 94301
Telephone: (650) 470-4500
5 Facsimile: (650) 470-4570

6 *Attorneys for Defendants*
7 MAPLE BEACH VENTURES LLC (NEVADA),
MAPLE BEACH VENTURES ONE, LLC (WYOMING), AND
MAPLE BEACH VENTURES ONE, LLC (DELAWARE)

1 I, Emily Reitmeier, hereby declare and state as follows:

2 1. I have reviewed Plaintiff's Notice of Petition and Petition to Confirm Arbitration
 3 Award and for Entry of Judgment (the "Petition"); Plaintiff's Administrative Motion to Seal
 4 portions of the Petition and related exhibits ("Motion to Seal"); the Declaration of Kerry Garvis
 5 Wright (the "Wright Declaration") and Exhibits 1-7 attached to the Wright Declaration.
 6 Defendants seek to narrow the scope of the redactions proposed by Plaintiff in her Motion to Seal.
 7 Attached to this declaration are Defendants' proposed redactions to the Petition, the Wright
 8 Declaration, and Exhibits 1-5 of the Wright Declaration.¹ Defendants propose that Exhibits 6 and
 9 7 to the Wright Declaration be sealed in their entirety.

10 2. Attached herewith as Exhibit A is a true and correct copy of a redacted version of
 11 the Petition. The final page of the Petition was hand signed and contains highlights in the original
 12 copy provided to Defendants. Defendants do not seek to seal any of the information on page 11 of
 13 the Petition.

14 3. Attached herewith as Exhibit B is a true and correct copy of a redacted version of
 15 Wright Declaration.

16 4. Attached herewith as Exhibit C is a true and correct copy of a redacted version of
 17 Exhibit 1 to the Wright Declaration.

18 5. Attached herewith as Exhibit D is a true and correct copy of a redacted version of
 19 Exhibit 2 to the Wright Declaration.

20 6. Attached herewith as Exhibit E is a true and correct copy of a redacted version of
 21 Exhibit 3 to the Wright Declaration.

22 7. Attached herewith as Exhibit F is a true and correct copy of a redacted version of
 23 Exhibit 4 to the Wright Declaration.

24 8. Attached herewith as Exhibit G is a true and correct copy of a redacted version of
 25 Exhibit 5 to the Wright Declaration.

26 1 The Court has a copy of the full, unredacted version of all exhibits referenced in
 27 this declaration, as they were filed by Plaintiff in connection with her Administrative Motion. (See
 28 Dkt. No. 2.) Defendants can provide the Court with unredacted versions Exhibits A-G to this
 declaration, which indicate, by highlighting, the narrower portions of the document that have been
 omitted from Defendants' redacted version upon the Court's request.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3 Executed this 8th day of February, 2021 at San Francisco, CA.

4 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

5 By: _____ /s/ *Emily Reitmeier*

6 EMILY REITMEIER

7 Attorneys for Defendants

MAPLE BEACH VENTURES LLC (NEVADA),

8 MAPLE BEACH VENTURES ONE, LLC (WYOMING), AND

MAPLE BEACH VENTURES ONE, LLC (DELAWARE)

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28